

Joint letter on concerns over the Substantiating Green Claims initiative's

Brussels, 21st of November 2022

Dear Executive Vice-President Timmermans,
Dear Commissioner Kyriakides,
Dear Commissioner Sinkevičius,
Dear Commissioner Wojciechowski,

CC Director Generals: Sandra Gallina, Florika Fink-Hooijer, Wolfgang Burtscher.

We, the undersigned civil society, retailers, and farmers associations, are writing to ask you to ensure that the future sustainability labelling principles that will apply to agri-food products are based on robust, adequate and transparent methodologies, in line with the objectives of the Farm to Fork and Biodiversity strategies.

While we fully support meaningful environmental labelling of food products and the fight against greenwashing, **we have serious concerns about the substantiating green claims proposal and the application of certain methodologies to agri-food products.** The proposed criteria lead primarily on Life Cycle Analysis (LCA) methodologies, such as the PEF, that cannot accurately reflect the complexity of agri-food systems and therefore, cannot properly assess the environmental performance of agri-food products. **The list of criteria set in the proposal should allow for other methodologies to be used, and the proposal should avoid any specific reference to the PEF in relation to food products,** since it fails to consider the hotspots of the agricultural and food sector such as biodiversity, pesticide use, soil quality and deforestation. Thus, its application on such products will undoubtedly lead to confusing messages for consumers, inconsistent directions for farmers and businesses, and finally, to institutionalised greenwashing.

At the same time, the upcoming sustainability labelling initiative within the Framework legislation on Sustainable Food Systems carried by DG SANTE would be the occasion to establish a process to have an open and transparent debate on the best methodologies to provide detailed, fair and unbiased information to consumers on the environmental impacts of different methods of production of agri-food products. **This process should not be preempted by the proposal on green claims. The assessment of the environmental performance of agricultural products deserves an in-depth discussion on how to reflect the complexity of agri-food systems.**

Methodologies based on LCAs, such as the PEF, were initially designed for industrial goods and were not meant to approach complex agri-food systems in a holistic way. While they are still relevant for manufactured industrial products, they are not adequate to assess the environmental performance of agri-food products. For the latter, LCAs-based methodologies are predominantly an indicator of yields, favouring the most intensive methods of production while disregarding both a number of positive elements and the negative externalities of different agricultural production methods.

How to define and assess the sustainability of food products should be discussed in the context of the upcoming Framework on Sustainable Food Systems with the establishment of an inclusive governance process that will take into account relevant stakeholders and civil society.

Sincerely Yours,

Monique Goyens, Director General, The European Consumer Organisation (BEUC)

Célia Nyssens, Senior Policy Officer for Agriculture and Food Systems, European Environmental Bureau (EEB)

Todor Ivanov, Secretary General, European Community of Consumers Co-operatives (EUROCOOP)

Eduardo Cuoco, Director, IFOAM Organics Europe

Jorgo Riss, Director of Greenpeace European Unit, Greenpeace

Olga Kikou, Head of Office, Compassion in World Farming EU (CIWF)

Virginia Enssle, Policy Officer, Fair Trade Advocacy Office (FTAO)

Alain Bazot, President, UFC-Que Choisir

